

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT- ATHLETE CONCUSSION INJURY LITIGATION)	MDL No. 2492
)	
)	Master Docket No. 1:13-cv-09116
)	
)	Judge John Z. Lee
)	
This Document Relates to All Cases)	Magistrate Judge Geraldine Soat Brown
)	
)	

CORRECTED JOINT MOTION FOR 60-DAY STAY

All parties to this litigation, except the *Nichols* Plaintiffs, by and through their attorneys, respectfully request a 60-day stay of the deadlines set forth in the Court's Case Management Order No. 1 (Master Dkt. #15), as amended, including the May 15, 2014 deadlines with respect to the submission of proposed scheduling orders and objections to leadership applications.¹ In support thereof, the parties state as follows:

1. On May 12, 2014, the parties engaged in a mediation with the Hon. Wayne R. Andersen (Ret.) and made continued progress as to resolution of the medical monitoring claims and requests for equitable relief, in addition to discussing the other claims more generally.

2. Due to the complexity of the issues and need for client approval, however, the parties respectfully request a 60-day stay, until July 14, 2014, to resolve all outstanding issues and finalize the settlement. The parties further request that the Court reset the May 29, 2014 case management conference to a status conference. At the May 29, 2014 status conference, the parties will be prepared to fully discuss these matters with the Court.

¹ The parties respectfully request that the 60-day stay apply to stay a decision on the applications for appointment of Lead Counsel and Liaison Counsel that have been filed.

WHEREFORE, the parties respectfully request that the Court grant this motion, enter a stay of all pending deadlines in these cases through July 14, 2014, reset the May 29, 2014 case management conference to a status conference, and grant such other and further relief as this Court deems appropriate.

Dated: May 13, 2014

Respectfully submitted,

For Plaintiffs:

For the National Collegiate Athletic Association

By: /s/ Steve W. Berman

By: /s/ Mark Mester

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: 206.623.7292
Facsimile: 206.623.0594

Mark S. Mester
mark.mester@lw.com
Johanna M. Spellman
johanna.spellman@lw.com
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611-3695
Telephone: 312.876.7700
Facsimile: 312.993.9767

Elizabeth A. Fegan
HAGENS BERMAN SOBOL SHAPIRO LLP
1144 W. Lake Street, Suite 400
Oak Park, IL 60301
Telephone: 708.628.4949
Facsimile: 708.628.4950

J. Christian Word
christian.word@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (202) 637-2200
Facsimile: (202) 637-2201

Proposed Lead Counsel for Defendant

Joseph J. Siprut
SIPRUT PC
17 North State Street, Suite 1600
Chicago, IL 60602
312.236.0000
Fax: 312.878.1342

Proposed Lead Counsel for the Medical Monitoring Plaintiffs

CERTIFICATE OF SERVICE

I, Steve W. Berman, an attorney, certify that I filed the [Corrected] Joint Motion For 60-Day Stay via the court's ECF system, which will serve all counsel of record in the above case.

Dated: May 13, 2014

Respectfully submitted,

By: /s/ Steve W. Berman